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6 UNITED STATES DISTRICT COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON
8 AT TACOMA

9 JENNIFER L. BOJE,

10 Plaintiff,

11 vs.

12 UNITED STATES OF AMERICA,

13 Defendants.

Case No.:

COMPLAINT

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15 **COMPLAINT**

16 This is an action seeking damages against the United States government for
17 negligence under the Federal Tort Claims Act.

18 **I. JURISDICTION**

19 1. The jurisdiction of this Court is based upon the Federal Tort Claims Act,
20 28 U.S.C. §'s 1346(b), 2671-2680. Paragraphs 2 through 6 hereof are incorporated herein
21 by reference.

22 2. Plaintiff Jennifer L. Boje is a citizen of the United States and resides in this
23 judicial district.

24 3. Plaintiff filed a claim with the United States Postal Service on or about
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1 November 12, 2019, as required by 28 U.S.C. §2675(a). A copy of that claim is attached
2 as Exhibit A.

3 4. The United States Postal Service has failed to make a disposition of
4 Plaintiff's claim within six months from the date of the Plaintiff's filing of the request for
5 reconsideration.

6 **II. VENUE**

7 5. Venue is proper under 28 U.S.C. §1402(b) because the acts giving rise to
8 the claim occurred in this judicial district.

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10 **III. CLAIMS FOR RELIEF – FEDERAL TORT CLAIMS ACT**

11 6. On May 11, 2018, Laura Belongia, while employed with the United States
12 Postal Service and operating a motor vehicle owned by the United States Postal Service
13 negligently collided the motor vehicle into plaintiff Jennifer L. Boje while plaintiff was
14 riding a bicycle, in a cross walk, in the city of Centralia, Lewis County, State of
15 Washington.

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17 7. At the time of the collision, Laura Belongia was acting within the course
18 and scope of her employment with the United States government as an employee of the
19 United States Postal Service.

20 8. As a result of the collision, plaintiff Jennifer L. Boje sustained serious
21 physical and emotional injuries and other damages.

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23 9. As a result of her injuries, plaintiff Jennifer L. Boje has suffered, and
24 continues to suffer, physical disability, pain, emotional trauma, medical expenses, loss of
25 earnings and earnings capacity, and such other general and special damages as shall be
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1 proven at the time of trial.

2 **IV. PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiff prays for judgment against the Defendant as follows:

4 1. For damages sustained by Plaintiff in the amount of \$200,020.00, including past
5 and future medical expenses and other health care expenses, pain and suffering, both
6 mental and physical, past and future permanent partial disability and disfigurement, loss
7 of enjoyment of life, damages to property, past and future special damages, and exemplary
8 and other damages.
9

10 2. Interest calculated at the maximum amount allowable by law, costs of suit
11 and other and further relief as this Court may deem just and equitable.

12 Dated this 20th day of January, 2021

13 HAROLD D. CARR, P.S.

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16 By: 

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